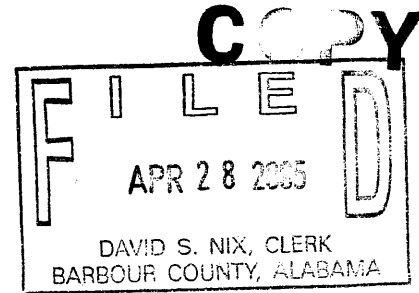


IN THE CIRCUIT COURT OF
BARBOUR COUNTY, ALABAMA
CLAYTON DIVISION



GARY WILLIS and GINA WILLIS,

Plaintiffs,

v.

FREEDOM MORTGAGE CORPORATION,
et al.,

Defendants.

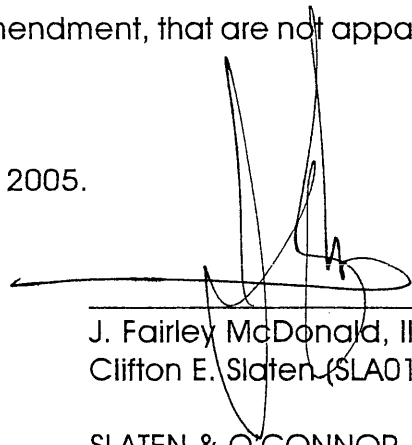
Civil Action No. CV-2004-035

MOTION FOR LEAVE TO AMEND ANSWER

Defendant FREEDOM MORTGAGE CORPORATION moves for leave to amend its Answer in this case in accordance with its separately filed Amendment and, as support, shows the following:

1. Plaintiffs GARY WILLIS and GINA WILLIS were deposed on April 26, 2005. Their deposition testimony establishes additional defenses under the Statute of Frauds, Ala. Code § 8-9-2, as set forth in the Amendment, that are not apparent from the allegations in the Complaint.

This the 27th day of April, 2005.



J. Fairley McDonald, III (MCD015)
Clifton E. Slaten (SLA013)

SLATEN & O'CONNOR, P.C.
105 Tallapoosa Street
Suite 101
Montgomery, Alabama 36104
(334) 396-8882

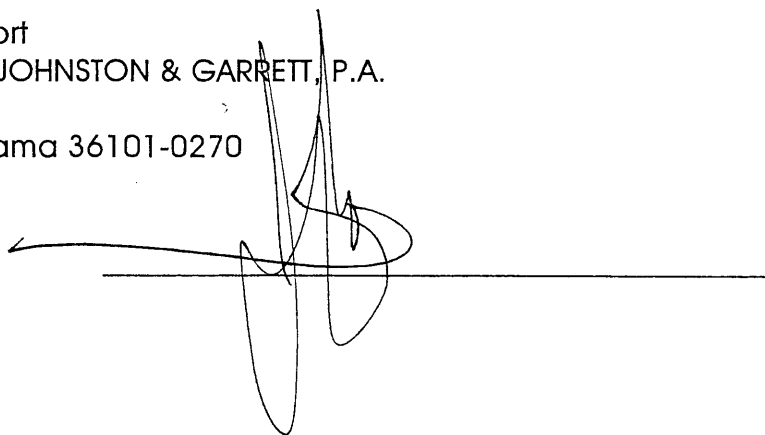
(334) 396-8880 [facsimile]

Counsel for Defendant FREEDOM MORTGAGE
CORPORATION

Certificate of Service

I HEREBY CERTIFY that, on this the 27th day of April, 2005, I served a copy of this Motion on the following counsel of record by first class United States Mail, postage prepaid and properly addressed:

Ronald G. Davenport
RUSHTON, STAKELY, JOHNSTON & GARRETT, P.A.
Post Office Box 270
Montgomery, Alabama 36101-0270

A handwritten signature in black ink is written over a horizontal line. The signature is stylized and appears to be 'R. Davenport'.